

Velsicol Superfund Site Findings for the Five-Year Review

prepared by
The Consensus Building Institute
July 2022

In May and June of 2022, EPA and the Consensus Building Institute reached out to stakeholders and members of the public around the Vesicol Superfund Site with a request to participate in stakeholder interviews. The purpose of interviews was to gather input on what the U.S. Environmental Protection Agency is doing well and where it could do differently or better in two areas – 1) on the remediation and clean-up of the site, and 2) on its public and stakeholder engagement. The findings from the interviews are intended to inform the agency’s five-year review, as well as an update to the Community Involvement Plan (CIP).

Between May 31 and June 28, 2022, the Consensus Building Institute conducted fifteen (15) interviews, in person near St. Louis, Michigan or over the phone/zoom, with seventeen (17) individuals. In order to meet the timeline for the five-year review, this summary draws from interviews done to date, and **focuses exclusively on input received about the investigation and clean-up**. While stakeholder views about EPA’s engagement are not disconnected from their views about the substantive clean-up of the site, this summary attempts to focus in primarily on those substantive comments that might best inform the five-year review. Additional interviews are expected in July and August, and **a more detailed summary about EPA’s public and stakeholder engagement and EPA relationships with stakeholders will be drafted at that time**.

This summary of findings related to the clean-up was shared with all interviewees as a preliminary draft for confirmation of accuracy, with a request to suggest any changes or additional input we might have missed. We received no suggestions for changes.

Key Findings from the interviews are summarized below:

- There has been a history of tension between EPA and the community about remediation approaches and the extent of removal actions. There was also tension with the city and State in the past. However, most interviewees noted improvements and increased satisfaction with the EPA’s performance on the clean-up over the past few years.
- Many interviewees offered strong praise for the technical skill and performance of EPA’s Remedial Project Manager (RPM). Many expressed both respect and personal affinity for him, and commented on his competence and commitment, and noted his effort and skill in securing funding resources for the site. He was called “creative,” “far-sighted”, and “the best in the business.” Several interviewees mentioned that they had a terrific working relationship with him, and many commented on how much the relationship had improved in recent years.

- Several interviewees expressed support for the current clean-up activities, such as the in-situ thermal remedy and the soil removal. Many noted that the EPA team was doing an excellent job implementing the ROD, and that the remediation was above and beyond what you will find most places.
- There was both recognition and frustration about the realities of EPA rules and funding challenges. Interviewees expressed frustration about the pace of progress, and some felt that attempts to limit costs have at times led to less rigorous clean-up or lower quality implementation than they wanted.
- There remains significant frustration for several community members about the completeness, materials and approach used in the soil remediation of the adjacent residential area and ball fields. In particular, several interviewees noted the worsened appearance and soil quality for some of the properties. Some property owners who invested intensively in their yard described how their landscaping was not restored as promised, and their soil cannot be worked or grow grass. Others noted that EPA needed to be pushed to aerate field soils after the fact.
- A core area of concerns for several members of the community is health impacts. Many wish that EPA could support or assist in the Emory University PBB study, and/or provide more opportunities for testing and evaluation of health impacts. Several also requested that EPA support or advocate for an on-going health clinic. While some acknowledged that on-going health concerns may be beyond EPA's scope, others pointed to the example of the EPA-funded health clinic for a community in Montana - though many recognized that this is the only case where this has occurred, some did not understand why the same case could not apply to St. Louis.
- Even to the extent that EPA cannot directly support health studies, testing, or care, several interviewees suggested that the EPA team could more clearly listen to, acknowledge, and validate the health concerns of residents, and reflect that community long-term health concerns are central to the clean-up process.

Overall, most interviewees expressed gratitude and support for EPA's current clean-up activities, and an emerging sense of partnership and comradery. Several noted that they were very happy to see the clean-up happening, and felt that the EPA was doing the best job it could given agency constraints. Though a sense of adversarial relationship continues for some, many of those interviewees tended to see this as inevitable, appropriate, and/or constructive, in order to keep pressure on EPA to address community concerns, and/or because EPA cannot be left to act as both Responsible Party and Regulator at the same time. And, while there is much stronger alignment in general on the EPA's approach to the clean-up, there are still some areas of disagreement. We heard the following substantive concerns, questions, or requests about the investigation and clean-up:

- Concerns remain about the quality and completeness of the residential remediation. Many community members requested a follow-up bird study to evaluate the effectiveness of the neighborhood clean-up, in order to confirm the level of success and identify any remaining concerns.

- A community member asked about the potential for migration of the slurry wall and requested that EPA confirm with site-adjacent residents to see if anything is coming into their basements.
- An interviewee suggested that EPA look into reactive chemistry at the site – how the combination of the different chemicals might be impacting each other – and respond to the community to share what they learn.
- Some questions were raised about the carbon amendments study – an interviewee noted that not all of the community’s questions about the study had been answered, and also criticized its slow pace.
- Some community members had questions about how climate change might impact the remedies being put in place in the future.
- A concern was raised about the limited footprint of the site, given the regional impact of PBBs that were taken to farms around the state and the migration of toxins. It was acknowledged that some requests for testing outside the site boundaries (e.g., railroad spur) have been addressed by EGLE, but some interviewees didn’t understand why EPA wasn’t responsible there as well.